

EXHIBIT F

From: Eidelman, Gary B.
Sent: Tuesday, July 31, 2018 4:17 PM
To: 'Shawn Shearer'
Cc: Cooper, Gillian A.; Kennedy, Lindsey C.; 'David Zeitlin'; Eidelman, Gary B.
Subject: RE: Barger v. First Data - Notice of Deposition - Kathy Benhardt

I have learned that Ms. Benhardt is not available on August 9. Per your request, I am seeing about Rule 30(b)(6) witnesses to testify on social media and the FMLA and leave policy aspects of the latest 30(b)(6) notice to see if they can be available on August 9 in NYC.

With respect to the 30(b)(6) notice dealing with the equity plans, those documents really speak for themselves. It is my understanding that Mr. Barger already sold his vested equity. Are there specific questions that you have vis a vis the equity plans that we could stipulate to so that I don't have to find a witness?

I believe that my office may be available on August 9. Will check and get back to you ASAP.

Gary B. Eidelman, Esq.
Saul Ewing Arnstein & Lehr LLP
Office: 410.332.8975
Mobile: 410.303.8832

From: Shawn Shearer [mailto:shawn@shearerlaw.pro]
Sent: Tuesday, July 31, 2018 4:07 PM
To: Eidelman, Gary B.
Cc: Cooper, Gillian A.; Kennedy, Lindsey C.; 'David Zeitlin'
Subject: RE: Barger v. First Data - Notice of Deposition - Kathy Benhardt

Gary – I know you will find this disappointing, the Brooklyn location is not available on August 9th, but I have obtained space at the Regus location in Manhattan we previously used for Ms. Benhardt's deposition. If you can commit to me that Ms. Benhardt is available for deposition on August 9th, I am willing to take her deposition in your office in Manhattan on August 9th. Let me know because I will need to send a revised notice of deposition in the next few hours. I will use the Manhattan Regus location unless I hear back from you.

Shawn E. Shearer
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From: Shawn Shearer [<mailto:shawn@shearerlaw.pro>]

Sent: Monday, July 30, 2018 11:30 AM

To: Eidelman, Gary B. <Gary.Eidelman@saul.com>

Cc: Cooper, Gillian A. <Gillian.Cooper@saul.com>; Kennedy, Lindsey C. <Lindsey.Kennedy@saul.com>; David Zeitlin <david@zeitlinlawfirm.com>

Subject: Re: Barger v. First Data - Notice of Deposition - Kathy Benhardt

Gary:

If Ms. Benhardt is not available, tell me when she is and I will depose your 30(b)(6) designee(s) that day in Brooklyn instead, and find a different date for Ms. Benhardt. Do not make any other plans for that date. Please advise by tomorrow.

Thanks

-Shawn

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On Jul 30, 2018, at 9:20 AM, Eidelman, Gary B. <Gary.Eidelman@saul.com> wrote:

Shawn:

We are checking on Ms. Benhardt's availability and will get back to you. With respect to Mr. Barger's deposition, we are not changing the location. It will be at my NY office beginning at 10 am on Aug 10. This also confirms that the MetLife deposition is not going forward on August 9. Thank you.

Gary B. Eidelman
Sent from my iPhone

On Jul 28, 2018, at 7:10 PM, Shawn Shearer
<shawn@shearerlaw.pro<<mailto:shawn@shearerlaw.pro>>> wrote:

****EXTERNAL EMAIL**** - This message originates from outside our Firm. Please consider carefully before responding or clicking links/attachments.

Gary – You have recently e-mailed indicating that you were firm on attending the deposition of MetLife in Lexington, KY on August 9, 2018. I have been informed by MetLife that the address in Lexington, KY is merely a PO box and there are no witnesses to depose in that location.

In addition, because of developments with MetLife, I do not believe that the deposition of MetLife scheduled for August 9, 2018 is going to occur on that date.

Because we both have that date reserved, attached is a notice of deposition for Ms. Kathy Benhardt for August 9, 2018 in Brooklyn. Ms. Benhardt is an officer of First Data and in your 26(a) disclosures list that I may only contact her through you.

As you know, Mr. Barger is scheduled to be deposed in August 10, 2018 in Manhattan.

Mr. Barger is in Atlanta. Ms. Benhardt is in Charlotte, NC. Currently, we both are planning to be in Lexington, KY and then NYC back to back days August 9 and 10. I suggest that it is more efficient and less costly for the entire cost of this litigation to bring everyone to Atlanta for August 9th and 10th. I would be willing to use the King & Spalding space for Ms. Benhardt's deposition, although for that deposition (given her large Excel spreadsheet native files), I will need to arrange for the ability to display documents by video means. The alternative would be that I could make arrangements for video and space at the same location we used in Atlanta before and you could use King & Spalding for Mr. Barger's deposition on the 10th.

If you are amenable to Atlanta instead of NYC, please let me know. In any event, we still have August 9 and 10 on the calendar for Benhardt and Barger depositions.

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<20180728 Notice of Deposition Kathy Benhardt.pdf>

"Saul Ewing Arnstein & Lehr LLP ([saul.com](http://www.saul.com)) " made the following annotations:

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